

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**Commonwealth of Pennsylvania, State of  
California, State of Delaware, District of  
Columbia, State of Maine, Commonwealth of  
Massachusetts, and State of North Carolina,**

Plaintiffs,

v.

Case No. 20-cv-4096

**Louis DeJoy, in his official capacity as  
United States Postmaster General, Robert M.  
Duncan, in his official capacity as Chairman  
of the Postal Service Board of Governors,  
and the United States Postal Service,**

Defendants.

**UNOPPOSED MOTION TO EXTEND  
DEADLINE TO FILE REPLY IN SUPPORT  
OF MOTION FOR CLARIFICATION**

Pursuant to the Court’s “Guidelines for Counsel”<sup>1</sup> and F.R.C.P. 6(b), Defendants hereby move the Court to extend Defendants’ deadline for filing a reply in support of its Motion for Clarification (ECF No. 116) from June 2, 2021 to June 9, 2021. The requested extension is justified since counsel for the Defendants have multiple filing obligations, including with respect to this case—where Defendants will have to start preparing its response to Plaintiffs’ Motion for Summary Judgment—and the related litigations. Furthermore, an extension will not interfere with the current schedule for resolving this litigation, since briefing over the clarification motion should be complete prior to the completion of summary judgment briefing.

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<sup>1</sup> <https://www.paed.uscourts.gov/documents/procedures/mchpol.pdf>.

Defendants have conferred with Plaintiffs, and Plaintiffs do not object to Defendants' request.

Dated: May 28, 2021

Respectfully submitted,

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Acting Assistant Attorney General

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Assistant Branch Director, Federal Programs Branch

/s/ Kuntal Cholera  
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Defendants.

**[Proposed] Order**

**IT IS HEREBY ORDERED** that Defendants' Motion to Stay the Deadline to Respond to Plaintiffs' Complaint is **GRANTED**.

It is **SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
The Honorable Gerald A. McHugh  
United States District Judge